

Message

From: Archer, Allie [Archer.Allie@epa.gov]
Sent: 3/8/2019 9:08:53 PM
To: Vranka, Joe [vranka.joe@epa.gov]; Stavnes, Sandra [Stavnes.Sandra@epa.gov]; Smidinger, Betsy [Smidinger.Betsy@epa.gov]; Benevento, Douglas [benevento.douglas@epa.gov]; Barker, Jacqui [barker.jacqui@epa.gov]; Davis, Patrick [davis.patrick@epa.gov]
Subject: Smurfit Interim Contingency Plan
Attachments: Interim Contingency Plan.pdf

Attached please find the Smurfit-Stone interim contingency plan. This plan provides the interim monitoring inspections and notifications that are required when responding to a high water event, as well as a plan for priority responses and sampling requirements. Below, I have included my personal notes on the interim plan. If you have any questions or need any more information please let me know. Thanks, Allie

Berm Study/Contingency Plans:

- 2018 Berm Geotechnical Studies completed:
 1. Overtopping Evaluation
 - a. Concluded available freeboard during a 100-year recurrence interval flood event is at least four to five feet at the lowest crest elevation.
 2. Geotechnical Evaluation
 3. Clark Fork River Berm Assessment and Reinforcement Report
- 2018 Interim Contingency Plan completed

Until final contingency plan in place, these inspections are required as outlined in the Interim Plan:

Daily Inspections	Required when NOAA gage station on eth CFR below Missoula, MT (BELM8) exceeds 11 feet for any part of that day.
Weekly Inspections	Required when NOAA gage station on eth CFR below Missoula, MT (BELM8) exceeds 10.5 feet for any part of that week.

- High flow/Spring runoff berm inspections will be initiated in mid-April 2015
- Draft Final Contingency Plan to Agencies by March 15, 2019
- 2019 Final Contingency Plan to be finalized no later than May 1, 2019

Recommendations from Interim:

1. The likely worst-case scenario is a significant breach in the Clark Fork River berm during high flood stage conditions that might threaten the internal berm. Pre-planning for this scenario should include the identification of non-contaminated on-site and off-site sources of borrow materials, 1-3 cubic yard supersacks, fine aggregate, stone and other materials that could be used in an emergency to slow-down and stop the breach and perform other response actions. Arrangements should be made with local contractors to mobilize and deliver equipment and personnel for anticipated response actions.
2. Visually assess the integrity of the internal secondary berm and perform repairs as necessary.
3. Identify downstream intakes and relevant stakeholders and include these contacts in the notification system as appropriate.
4. Include contingencies to account for the catastrophic failure of upstream ice dams and other flood regimes associated with ice flows in the Clark Fork River.
5. Perform modelling of how water from the Clark Fork River would flow on-site should the berm fail in a variety of flow regimes.
6. Perform modelling to better understand how river dynamics in the Clark Fork River could erode or otherwise impact the berm in a variety of flow regimes.

Engage stakeholder and include this input in the development of a Final Contingency Plan.

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